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*Attorneys for the Boards of Trustees of the
Southern Nevada Cement Masons Trusts*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * * * *

Board of Trustees of the Cement Masons
and Plasterers Health and Welfare Trust;
Board of Trustees of the Cement Masons
and Plasterers Joint Pension Trust; Board
of Trustees of the Cement Masons and
Plasterers Vacation Savings Plan Trust;
Board of Trustees of the Operative
Plasterers and Cement Masons
International Association Local 797
Apprentice and Journeyman Training
Trust; Board of Trustees of the Operative
Plasterers and Cement Masons
International Association Training Fund;
Painting and Decorating Contractors
Association Contract Administration and
Industry Fund,

Plaintiffs,

vs.

Arenas, Parks & Stadiums Solutions, Inc.,
aka Arenas Parks and Stadiums Solutions
Inc, a foreign corporation; Suretec
Insurance Company, a foreign
corporation; DOES 1–10 & ROES 1–10;

Defendants.

CASE NO.: 2:19-cv-01362-JCM-BNW

**STIPULATION TO DISCLOSE
PAYROLL RECORDS AND TO
STAY CASE AS TO DEFENDANT
ARENAS, PARKS & STADIUMS
SOLUTIONS, INC. FOR A PERIOD
NOT TO EXCEED 60 DAYS**

1 IT IS HEREBY STIPULATED AND AGREED between the Parties to this Stipulation
2 (Plaintiffs and Defendant ARENAS, PARKS & STADIUMS SOLUTIONS, INC. ("APSS")),
3 as follows:

4 1. APSS, acting through its duly-appointed Chief Operating Officer, Vincent
5 Caccamo, acknowledges that it was served with a copy of the Summons and Complaint in this
6 action on October 1, 2019, as shown by the Affidavit of Service filed with the Court (ECF
7 No. 5);

8 2. APSS has not yet filed an answer, responsive pleading, or otherwise appeared
9 in this action;

10 3. APSS acknowledges that one form of relief sought by the Plaintiffs in this
11 Case is an Order compelling APSS to disclose to Plaintiffs certain information, including
12 payroll records covering APSS' operations for the months of November 2017 and May 2018
13 (the "Records");

14 4. APSS has not disclosed the Records to the Plaintiffs and declares that it prefers
15 to promptly and informally disclose the Records to Plaintiffs' counsel rather than appearing
16 immediately in the Case and disclosing the Records through formal discovery proceedings;

17 5. The Parties have therefore executed this Stipulation intended to stay the Case
18 as to APSS for a period of not more than sixty (60) days from the date on which the fully
19 executed Stipulation is filed by Plaintiffs with the Court (the "Stay"), during which period of
20 time APSS shall disclose the Records to Plaintiffs' counsel and Plaintiffs shall endeavor to
21 use the Records to complete a compliance review of APSS' payroll practices;

22 6. While the Parties agree that Plaintiffs may cause the Stay to terminate early by
23 notifying APSS of Plaintiffs' desire to terminate the Stay in an email sent to Vincent Caccamo
24 (vinny@apssolutions2012.com), the Stay may be extended beyond sixty (60) days only by
25 written Order of the Court;

26 7. Upon approval of this Stipulation by the Court, the Stay proposed by the
27 parties shall be in effect for up to sixty (60) calendar days after the date on which this
28

1 Stipulation is filed by Plaintiffs, and while the Stay remains in effect, APSS shall have no
2 obligation to appear, answer or otherwise respond to the Complaint;

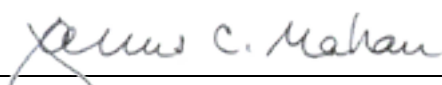
3 8. APSS shall file its answer or other response to the Complaint not later than
4 twenty one (21) days following the date on which the Stay terminates;

5 9. APSS reserves all rights, claims, and defenses in this action.

6
7 **ORDER**

8
9 Good cause appearing, IT IS SO ORDERED.

10
11 DATED and done this 8th day of January, 2020.

12
13 
14 _____
UNITED STATES DISTRICT COURT JUDGE

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16
17
18 [PARTY SIGNATURES FOLLOW]

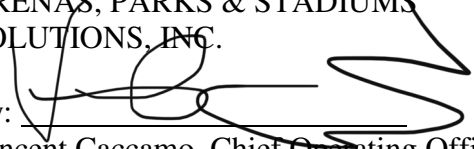
19
20 Dated: January _____, 2020.

21 CHRISTENSEN JAMES & MARTIN

22
23 By: _____
24 Daryl E. Martin, Esq.
25 Attorneys for Plaintiffs *Southern*
Nevada Cement Masons Trusts

Dated: January _____, 2020.

26 ARENAS, PARKS & STADIUMS
27 SOLUTIONS, INC.

28 By: 
Vincent Caccamo, Chief Operating Officer
Email: Vinny@apssolutions2012.com
Cell: (914) 346-2366

1 Stipulation is filed by Plaintiffs, and while the Stay remains in effect, APSS shall have no
2 obligation to appear, answer or otherwise respond to the Complaint;

3 8. APSS shall file its answer or other response to the Complaint not later than
4 twenty one (21) days following the date on which the Stay terminates;

5 9. APSS reserves all rights, claims, and defenses in this action.

6
7 **ORDER**

8
9 Good cause appearing, IT IS SO ORDERED.


10
11 DATED and done this ____ day of _____, 2020.

12
13 _____
14 UNITED STATES DISTRICT COURT JUDGE

15
16
17
18 [PARTY SIGNATURES FOLLOW]

19
20 Dated: January 6, 2020.

21 CHRISTENSEN JAMES & MARTIN

22
23 By: 
24 Daryl E. Martin, Esq.
25 Attorneys for Plaintiffs *Southern Nevada Cement Masons Trusts*

20 Dated: January _____, 2020.

21 ARENAS, PARKS & STADIUMS
22 SOLUTIONS, INC.

23 By: _____
24 Vincent Caccamo, Chief Operating Officer
25 Email: Vinny@apssolutions2012.com
26 Cell: (914) 346-2366